

Message

From: Chow, Alice [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B446A8F46F6447EE8294845B0A066623-ACHOW]
Sent: 12/18/2019 3:04:36 PM
To: Chakrabarty, Renu M [Renu.M.Chakrabarty@wv.gov]
CC: Fernandez, Cristina [Fernandez.Cristina@epa.gov]; Bin.Z.Schmitz@wv.gov; Egnor, Michael [Michael.Egnor@wv.gov]; McClung, Jon D [Jon.D.McClung@wv.gov]; Fry, Jessica [fry.jessica@epa.gov]; Schmidt, Howard [schmidt.howard@epa.gov]; Crowder, Laura M [laura.m.crowder@wv.gov]; Arnold, David [arnold.david@epa.gov]
Subject: RE: Availability for conference call w/ WV DAQ re EtO? - follow-up on call with EPA R3

Renu: Just to follow up on our discussion yesterday:

- Polyether Polyols MACT—the last RTR was done in 2014. OAQPS says the next one will be done in 2022. They currently do not have anything scheduled sooner.
- EPA assistance for HEM/AERMOD—Jessie Fry says that your AERMOD results can be input for the HEM model. She will check with the HEM folks to make sure she has the steps and the format to do so.
- Ambient monitoring for EtO—I have initiated conversations with our Ft. Meade lab folks to see if they are willing to provide support. We have discussed with OAQPS how to get Ft. Meade up to speed on the revised method. In my absence during the next 2 weeks, Howard will take the lead with Ft. Meade (if they are around) to gauge their interest and capabilities. As for the national contract, ERG would be the other option. We can check out the costs for you. Ft. Meade would be free.

If you have any additional questions, feel free to contact Howard starting next week. I will be back in the office 1/6/20.

Happy Holidays!
Alice

Alice H. Chow
Chief, Air Quality Analysis Branch (3AD40)
USEPA, Region 3
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From: Chakrabarty, Renu M <Renu.M.Chakrabarty@wv.gov>
Sent: Tuesday, December 17, 2019 1:33 PM
To: Chow, Alice <chow.alice@epa.gov>
Cc: Fernandez, Cristina <Fernandez.Cristina@epa.gov>; Bin.Z.Schmitz@wv.gov; Egnor, Michael <Michael.Egnor@wv.gov>; McClung, Jon D <Jon.D.McClung@wv.gov>; Fry, Jessica <fry.jessica@epa.gov>; Schmidt, Howard <schmidt.howard@epa.gov>; Crowder, Laura M <laura.m.crowder@wv.gov>
Subject: RE: Availability for conference call w/ WV DAQ re EtO? - follow-up on call with EPA R3

Alice,

Thank you and Howard for the EtO discussion this morning.

My notes are as follows:

- The need for EPA to prioritize reviewing the Polyether Polyols NESHAP (40 CFR 63, Subpart PPP) for any updates in light of the new EtO cancer unit risk factor. Three of the high risk NATA facilities are subject to this NESHAP with respect to EtO emissions reductions requirements.

Alice will continue to raise this internally on her calls with OAQPS, however, there are no plans for EPA to address the PPP MACT at this time. DAQ will send an official request to EPA Region 3 to request an update to the RTR review of the PPP MACT since our EtO hotspot facilities are subject to this rule.

- The need for EPA to provide assistance on air dispersion modeling – for example, processing on-site met data provided by the company, possibly running HEM based on site-specific AERMOD runs, etc.

Alice indicated EPA Region 3 can definitely help DAQ, including helping piece met data from the company together; Howard can take on this task [Jon McClung will send this data for the Institute site over; we don't have anything on So. Charleston at this point]. She will check to see what may be needed for additional HEM runs; DAQ will be doing site-specific modeling – can these results be fed into HEM to updated exposure/risk info.?

- The need for EPA to provide assistance with monitoring – for example, provide samplers (Summa canisters) and Lab access (possibly divert some 105 grant funding to cover part of this)

EPA Region 3 purchased many summa canisters for the Marcellus shale studies several years ago; these include the umbrella hangers and regulators. These can be made available to DAQ. Regarding lab time, DAQ can contract with ERG; alternatively EPA R3 is not sure if the Fort Mead Lab can do the EtO analysis (Alice will check), if so, then perhaps 105 grant funding can be allocated towards this.

ORD is developing possible new EtO monitoring methods such as optical methods; these would be available at the earliest in Summer 2020; Doris Chen is the lead.

New news –

- Alice indicated that Mark Ferrell said that OAQPS had offered DEP/DAQ the services of a third-party service to facilitate public meetings, including setting the agenda and involving the EJ communities and activities; DAQ is not at this stage yet. Stacy Smith is one of the facilitators (she has worked with the Governor on education issues in the past).
- The Braun facility in PA is in to PADEP with a permit to add/change the control device to a thermal oxidizer
- The chemical facility in DE is back in operation with a second scrubber added
- WV DEP responded to the EtO FOIA on EPA-provided info. on Dec. 13th; DEP also put out a general press release.
- There is a ethylene oxide lawsuit against Union Carbide.
Facebook video post on ethylene oxide lawsuit
"If you're living within a five-mile radius of these different factories, you have a very high risk of contracting one of these cancers."

Attorney Mike Morgan explains the potential risks of prolonged exposure to ethylene oxide

<https://www.facebook.com/MMForthePeople/videos/vb.313942829424/833439343742129/?type=2&theater>

From: Crowder, Laura M <Laura.M.Crowder@wv.gov>
Sent: Monday, December 16, 2019 1:40 PM
To: Chow, Alice <chow.alice@epa.gov>
Cc: Fernandez, Cristina <Fernandez.Cristina@epa.gov>; Chakrabarty, Renu M <Renu.M.Chakrabarty@wv.gov>; Egnor, Michael <Michael.Egnor@wv.gov>; McClung, Jon D <Jon.D.McClung@wv.gov>; Fry, Jessica <fry.jessica@epa.gov>; Schmidt, Howard <schmidt.howard@epa.gov>
Subject: Re: Availability for conference call w/ WV DAQ re EtO?

Tuesday at 9 am. Call me and we will all meet in my office.

Laura

On Dec 16, 2019, at 7:39 AM, Chow, Alice <chow.alice@epa.gov> wrote:

Laura: Cristina is out of the office starting 12/17 until 1/6/20. I will be happy to discuss your issues (along with my staff). We can be available on Tuesday 9-10 am, or Wednesday 9-10 am. Let me know your preference.

Alice

Alice H. Chow
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USEPA, Region 3
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From: Crowder, Laura M <Laura.M.Crowder@wv.gov>
Sent: Thursday, December 12, 2019 5:11 PM
To: Fernandez, Cristina <Fernandez.Cristina@epa.gov>
Cc: Chow, Alice <chow.alice@epa.gov>; Chakrabarty, Renu M <Renu.M.Chakrabarty@wv.gov>; Egnor, Michael <Michael.Egnor@wv.gov>; McClung, Jon D <Jon.D.McClung@wv.gov>
Subject: Availability for conference call w/ WV DAQ re EtO?

Cristina,

I would like to setup a conference call with you and your staff as soon as possible with EPA Region 3 to discuss the following issues with respect to Ethylene Oxide:

- The need for EPA to prioritize reviewing the Polyether Polyols NESHAP (40 CFR 63, Subpart PPP) for any updates in light of the new EtO cancer unit risk factor. Three of the high risk NATA facilities are subject to this NESHAP with respect to EtO emissions reductions requirements.

- The need for EPA to provide assistance on air dispersion modeling – for example, processing on-site met data provided by the company, possibly running HEM based on site-specific AERMOD runs, etc.
- The need for EPA to provide assistance with monitoring – for example, provide samplers (Suma canisters) and Lab access (possibly divert some 105 grant funding to cover part of this)

We are available at the following times:

- Tuesday, 12/17, 9-11 am
- Wednesday, 12/18, 9-10 am, 1-3 pm
- Friday, 12/20, 9am -12 pm
- Friday, 1/3, All day

Please let me know if any of these time work for you and your staff.

Thank you!

Laura

Laura Mae Crowder

Director

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